



MOSER EMPLOYMENT LAW FIRM, P.C.

WORKERS' RIGHTS ATTORNEYS

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April 21, 2017

Hon. A. Kathleen Tomlinson, USMJ
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Rodriguez v. Ridge Pizza, Inc.*, 16-cv-00254(DRH)(AKT)

Dear Judge Tomlinson:

I represent the Plaintiffs in the above referenced case. I write for two reasons:

First, the deadline for amendment of pleadings is February 28, 2017. At the initial conference Counsel for the Defendant indicated that Plaintiff's had not properly identified the Corporate Entity doing business as Alfredo's Pizzeria. Because the Plaintiffs were not furnished with wage notices or wage statements, they were never advised as to the legal name of their employer. I informally requested information regarding the correct corporate name of Alfredo's Pizzeria after the initial conference, and the Defendants have not furnished such information to date.

Plaintiffs also formally requested information regarding the correct corporate name of the Defendants in our First Set of Interrogatories. Unfortunately, responses are due on April 28, 2017, the same date as the deadline for a motion to amend the pleadings.

Plaintiff therefore requests that they be given two weeks from the date on which the legal name of the corporate entity doing business as Alfredo's Pizzeria is furnished by the Defendants to file a motion to amend the pleadings.

Second, I have lost contact with one of the Plaintiffs, Francisco Rodriguez. Upon information and belief, he has moved and his cell phone is no longer working. As he has not furnished us with an updated address and telephone number, we cannot respond to Defendants' discovery requests on his behalf. I therefore request that I be given leave to withdraw as attorney for Mr. Francisco Rodriguez *only*.

A copy of this letter has been mailed to Mr. Rodriguez' last known address.

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Letter to Hon. A. Kathleen Tomlinson, USMJ

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Steven J. Moser', is written over a light gray rectangular background.

Steven J. Moser